

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR DRAFT No. F-01-029

CURTIS-MARUYASU AMERICA, INC.

LEBANON, KY.

DECEMBER 22, 2004

GENELLE K. FARLEY, REVIEWER

PLANT I.D. # 21-155-00021

APPLICATION LOG # 50142

**SOURCE DESCRIPTION:**

Curtis-Maruyasu America, Inc., is an existing source located in Lebanon. This plant manufactures fuel and brake tubing from copper plated, low carbon steel strips. The plant has a double walled tubing (DWT) line, and four single-walled tubing (SWT) lines. The process for the DWT line include roll forming, electric furnace brazing, zinc electroplating, chromate conversion coating, and painting. Process for the three SWT lines include zinc electroplating, chromate conversion coating, paint primer application and nylon extrusion. The last SWT line involves extrusion only.

**COMMENTS:**

401 KAR 61:132, Existing miscellaneous metal parts and products surface coating operations

Under regulation 401 KAR 61:132, Existing miscellaneous metal parts and products surface coating operations, Section 2(1), each affected facility commenced before February 4, 1981 and is located in a county classified as nonattainment is subject to the standards of the regulation. Marion County is classified as attainment and, Curtis-Maruyasu is therefore exempt from any requirement of this regulation.

The permit review branch received an application for a permit to operate a fuel and brake tubing facility on December 19, 1996. The application proposes to make the operation of the afterburner which is used to control VOC and isophorone emissions federally enforceable, thereby keeping the potential to emit for isophorone, a hazardous air pollutant, to be below 10 tons/year and VOC's less than 90 tons per year as well as other hazardous air pollutants which are also limited to less than 10 tons/year. The application was logged complete on August 01, 2001. All information used in this review was derived from the application and additional information by the applicant. The chromate conversion-coating tank has a packed bed scrubber with an efficiency of 90%. The afterburner has a control efficiency of 95%.

Applicable regulations: 401 KAR 52:030, 401 KAR 59:010, and 401 KAR 59:015

Pursuant to Regulation 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations, Section 2(2), each affected facility commenced on or after February 4, 1981 but prior to June 24, 1992 is exempt from this regulation except that control devices and procedures required by this regulation to control volatile organic compound emissions at the time it commenced shall continue to be operated and maintained. No control devices or procedures are required for the control of volatile organic compound emissions for these affected facilities because affected facilities located in Marion County were exempt from any requirements in the older version of this regulation dated February 4, 1981.

**COMMENTS (CONTINUED):**

Curtis-Maruyasu is opting for limits as a conditional major, so they are not regulated by 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

1. Volatile organic compound (VOC) emissions shall not equal or exceed 90 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.
2. Hazardous air pollutants (HAPS) emissions shall not equal or exceed 10 tons per year individually and 22.5 tons per year combined based on a rolling 12 month total for the entire source to preclude a major source Title V review.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.